

Appendix A

United States Courts Southern  
District of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
Houston DIVISION

**March 05, 2021**

Nathan Ochsner, Clerk of Court

Roderick E. Kirk

versus

Fashion Nova  
12589 Lakeland Rd  
Santa Fe Springs, CA 90670

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§  
§

CIVIL ACTION NO. \_\_\_\_\_

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Roderick E. Kirk

Address:

16170 Westpark Dr #304  
Houston, Tx. 77082

County of Residence:

Harris

3. The defendant is:

Fashion Nova

Address:

12589 Lakeland Rd  
Santa Fe Springs, CA 90670

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on \_\_\_\_\_ with the Equal Opportunity Commission.

5. On the date of \_\_\_\_\_, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☐ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☐ religion
- (e) ☐ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
- (b) ☐ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff

- (d) ☒ other: FashionNova discriminated against  
me Roderick E Kirk because of  
my temporary status as an employee.

7. When and how the defendant has discriminated against the plaintiff:

On the said date of December 1, 2020 - December  
8, 2020 FashionNova discriminated against me  
Roderick E Kirk to create a harrassous work environment.

8. The plaintiff requests that the defendant be ordered:

- (a) ☒ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☐ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff

(e) ☐ to \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ and that;

(f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.

  
(Signature of Plaintiff)

Address: 16170 Westpark Dr #304  
Houston, Tx 77082  
Telephone: (213) 567-1757

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SOUTHERN DISTRICT OF TEXAS  
\_\_\_\_\_ DIVISION

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CIVIL ACTION NO. \_\_\_\_\_

ORIGINAL COMPLAINT

I Roderick E. Kirk the plaintiff make my complaint against Fashion Nova. When I worked for Fashion Nova from December 1, 2020 to December 8, 2020 through a temporary company Fashion Nova created a very hazzardous, dangerous and unsafe work environment. my life was threatened inside their facility and pursued outside their facility by those who operated the system that was in place. ~~I~~ <sup>I</sup> was told to wear mask wash ~~out~~ <sup>my</sup> hands and practice social distences and I did that but Fashion Nova had another side to their system to where they would isolate only the temp worker then you would not see them anymore. Well Fashion Nova did the same to me but I did not fall by their unlawful practice. I beat their system that night on December 8, 2020 and left their facility mentally and emotionally battered.



Fashion Nova came after me on Shantel. I say the men who operated their system came after me, they chased me all the way to Santa Monica California where I had to hide behind store dumpsters, on the beach and in all kind of places for 3 days fearing for my life. I went to the Santa Monica Police Station but they were not letting anyone in due to the pandemic so I was on my own with no help except my folks back here.† I charge Fashion Nova with crossing all lines of trust because when I go to work for a company I never would think that they would work you for a week then try to kill you. That's not the American way. I charge Fashion Nova with fraud because they lured the public in with a high wage especially temp workers never intending to pay them. I charge Fashion Nova with attempted murder, pain and suffering, injustice, discrimination, mental and physical damage and a unlawful practice. I also charge Fashion Nova with a violation of all labor laws. I have nightmares and I'm very not at ease with this situation. I know when I worked there that there were laws concerning the pandemic the thing is is that Fashion Nova did not have now testing at all.

Case 4:21-cv-00766 Document 1-1 Filed 03/05/21 Page 6 of 7  
I'm looking for justice in this case because of an American if you check the records every time I crossed the line I paid my debt to society. I am seeking compensation because I can no longer work for any company due to what Fashion Nova has done to me. In my case there has been a total breach of trust. My work was all I had left, and now even that has been taken away from me. The pain and suffering is worst than anything I've been through. I Am seeking justice for me and my family.

### my Prayer:

Father God let justice come, for we know that through justice comes all other gifts, such as faith, hope, and love. Without justice these doors are closed. Not my will but Your will be done. Amen +



Due to the fact that I may not work for any  
Company ever again I'm seeking the full potential of  
my capability for the next ten years. The full potential  
of any man ~~of~~ in America is 2.5 million dollars per  
year but only 2% of the American population ever  
get there. And I would like to see Fashion Nova  
purchase and distribute 200 thousand vaccines  
for the American public. To join the fight  
to save lives instead of taking them.

Roderick Kirk +